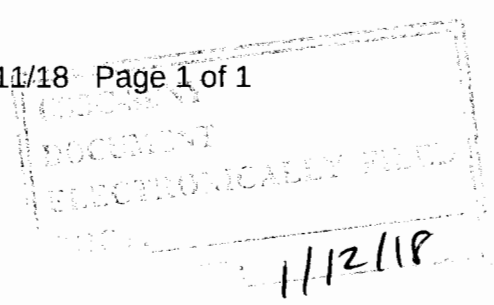


MEMO ENDORSED



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-6557

January 11, 2018

BY ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Application granted. SO ORDERED.

Ronnie Abrams, U.S.D.J.
January 12, 2018

RE: Pusepa v. Annucci, No. 17 Civ. 7954 (RA) – [rel. Doe v. Annucci, 17 Civ. 1765 (RA)]

Dear Judge Abrams:

This Office has received requests for representation from all defendants other than Rueben Illa and the unnamed Doe defendants in the above-captioned *Pusepa* case, has agreed to return waivers of service to plaintiff's counsel on their behalf, and anticipates it will be representing most of these defendants in the *Pusepa* case. We also represent defendants Annucci, Effman and Kaplan in the related *Doe* case ("Supervisory Defendants"). We write to respectfully request, with the consent of plaintiff's counsel, that both the time for all defendants to respond to the complaint in *Pusepa* and the time for Supervisory Defendants to respond to the complaint in *Doe* be set at 60 days from today, *i.e.*, March 12, 2018.¹

The grounds for this request are that this Office needs additional time to determine whether it is able to represent all defendants in *Pusepa*, and counsel wish time to explore the potential early settlement of both actions.

Respectfully,

/s/

Daniel Schulze
Special Litigation Counsel

cc. Plaintiff's Counsel of Record (in both cases) (by ecf)

¹ The Court has indicated it intends to set a single schedule governing both cases. (*Pusepa* Docket 8). We believe there is no current response date in either case. The return of the waivers in *Pusepa*, most of which are dated October 18, 2018, could be read to require a response by December 18, 2017, but their return was contingent upon the agreed extension of this date. The Court extended the response date for Supervisory Defendants in *Doe sine die*. (*Doe* Docket 24).